

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MANDAR MIRASHI,

Plaintiff,

v.

JOHN DOE,

An unknown individual(s),

v.

521.99931468 Bitcoin,

***In rem* Defendant,**

v.

**FixedFloat, Kraken, ChangeNow,
exch.cx, TradeOgre, and John Doe 2,**

Relief Defendants.

Case. No.

**PLAINTIFF'S MOTION FOR
TEMPORARY RESTRAINING
ORDER WITHOUT NOTICE**

Plaintiff Mandar Mirashi hereby moves this Court for a Temporary Restraining Order issued without notice pursuant to Federal Rule of Civil Procedure 65(b)(1). In support of his motion, Plaintiff relies on the Complaint in this action, his Declaration, the Declaration of his counsel in accordance with Federal Rule of Civil Procedure 65(b)(1)(B), his brief in support of this motion, and the Report on Fraud Event.

Plaintiff moves the Court to:

- (i) Order the Relief Defendants to freeze any of Mr. Mirashi's Bitcoin in their possession, custody or control until further order of the Court;
- (ii) Order the Relief Defendants to freeze the accounts and assets of any parties who deposited Mr. Mirashi's Bitcoin with the Relief Defendants until further order of the Court; and
- (iii) Order any present or future holders of Mr. Mirashi's Bitcoin that are withdrawn from addresses:

bc1qedyy7dfqz7kcesk8ap5kv0sq90c0cctv75fjda;
bc1q5uhs4kwaq685hx2p9klhzufw6kzck65x9znvua;
bc1qwjtugew73j8zhc0xhez905fvytj5g4307czjf;
35sBUp4t5t8gerEu9HswPiNhRSTnnS8qWX;and
38WP9sta67jMzwPrzWfrGMci7qVCpX4cFY

to freeze those assets until further order of the Court.

A proposed form of Order accompanies this motion.

Respectfully submitted,

Law Office of Adam R. Gonnelli, L.L.C.

By 

Adam Gonnelli

707 Alexander Road

Building 2, Suite 208

Princeton, New Jersey 08540

phone: (917) 541-7110

adam@arglawoffice.com